

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JAMIE MILLS and MARISSA SCHRYER,

Plaintiffs,

v.

QUESTX, LLC,

Defendant.

Case No. 1:21-CV-01065-JMB-RSK

**PLAINTIFFS' RENEWED UNOPPOSED MOTION FOR
APPROVAL OF SETTLEMENT AND STIPULATION OF
DISMISSAL OF LAWSUIT WITH PREJUDICE**

Plaintiffs, Jamie Mills and Marissa Schryer, by and through their undersigned counsel, individually and on behalf of all Opt-In Plaintiffs (“Plaintiffs”), file this Renewed Unopposed Motion for Settlement Approval and Dismissal with Prejudice (“Motion”)¹ seeking the Court’s approval of the Settlement, specifically, the Settlement and Release Agreement, on file at ECF No. 32 (“Agreement”), and certification of a collective action, for settlement purposes only. Approval of the proposed Agreement, Dismissal with Prejudice, and certification of a collective action is further supported by the attached Memorandum of Law and the declaration of Plaintiffs’ lead counsel, Clif Alexander. Plaintiffs further state:

¹ Plaintiffs previously filed their Unopposed motion for Approval of Settlement and Stipulation of Dismissal of Lawsuit with Prejudice on June 28, 2022. *See* ECF No. 27. Plaintiffs subsequently sought leave to file the settlement agreement under file. *See* ECF No. 28. On July 11, 2022, this Court denied both pending motions, without prejudice, because they failed to attach an unredacted version of the settlement agreement. *See* ECF No. 30. On July 11, 2022, Plaintiffs refiled their motion seeking leave to file the settlement agreement under seal and correctly filed the unredacted settlement agreement as an exhibit to that Motion. *See* ECF Nos. 31 and 32. On July 12, 2022, this Court granted the Motion and permitted the filing of the settlement agreement under seal. Plaintiffs now refile their Renewed Unopposed motion for Approval of Settlement and Stipulation for Dismissal of Lawsuit with Prejudice.

1. A *bona fide* dispute exists between Plaintiffs and Defendant QuestX, LLC (“Defendant”).

2. The terms and conditions of the proposed settlement between Plaintiffs and Defendant, as defined and described in the Agreement, are fair, reasonable, and adequate.

3. The form of the Notice of Settlement and the method of disseminating this information to Plaintiffs, as described in the Agreement are fair, reasonable and adequate.

4. That the method of allocating a settlement award to each Plaintiff is fair, reasonable, and adequate.

5. That the attorneys’ fees and costs are fair, reasonable, and adequate.

6. That for purposes of settlement a FLSA collective action should be certified, consisting of the following similarly situated individuals:

The “Settlement Collective” or the “Collective” consists of all current or former hourly call-center employees who worked for QuestX, LLC anywhere in the United States, at any time from December 17, 2018 through April 25, 2022, who previously filed a consent to join this Lawsuit (“Named Plaintiffs and the Opt-In Plaintiffs” or “Plaintiffs”).

7. Defendant does not oppose the relief requested herein.

Dated: July 25, 2022

Respectfully submitted,

/s/ Clif Alexander
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Counsel for Plaintiffs and Opt-In Plaintiffs

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Defendant's counsel of record and Defendant is not opposed to the filing of this Renewed Motion and supporting Memorandum, or the relief requested therein.

/s/ Clif Alexander

Clif Alexander

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2022, a copy of the foregoing document was filed electronically in the United States District Court for the Eastern District of Michigan. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Clif Alexander

Clif Alexander